

1898-021 Chancery Causes: Elizabeth Eads vs. Harrison Eads &
Lee Co.

Bales, Moore, Edds, Dean

Ch-Estate Dispute
T-Property

To the Hon. W. T. Niller, Judge of the Circuit court for Lee County:

Your oratrix, Elizabeth Eads, humbly complaining would respectfully represent unto your honor, that about 15 years ago one Huston Eads the father of her late husband, Henry Eads, died seized and possessed of a valuable tract or parcel of land of ~~abt~~ about 150 acres and lying and being in Lee County, in the Bales Forge neighborhood and adjoining the lands of Martha Fulkerson Elbert Bales and others; that when said Huston Eads died he left surviving him his wife, Amanda C. and five children, to-wit, Margerett Eads, who afterwards married one James More, Henry Eads, Ida Eads, Harison Eads and Maud Eads; that ~~some~~ ^{ten} years ago your oratrix and the said Henry Eads were married to each other; that her husband the said Henry in June, 1897, departed this life intestate and no issue was born alive of the marriage.

Your oratrix will further show unto your honor that her late husband the said Henry Eads ~~and said Harison Eads~~ purchased from one Elbert Bales a tract of land of about 50 acres adjoining the said tract of 150 acres; that the said Amanda Eads after the death of her said husband Huston Eads married and is now the wife of one Stephen Bales Sr.; that the said Harison Eads, Ida Eads and Maud Eads are infants under the age of 21 years, and that at the time of the death of the said Henry Eads he was the owner of a one fifth interest in the said 150 acre tract of land subject ~~to~~ to the dower rights of the said ^{Amanda} ~~Henry~~ C. Bales, and also ~~and said Harison Eads~~ in the said 50 acre tract purchased as aforesaid by the said Henry ~~and Harison Eads~~ from the said Elbert Bales.

Now the premises considered your oratrix is advised that she is entitled to have dower assigned to her out of the said real estate of her said husband, and if need be, said real estate par-

tioned and dower assigned in said 150 acre tract to the said

Amanda
~~Mary~~ C. Bales, the same never having hertofore having been done.

The prayer therefore of your oratrix is that Amanda C.

Bales, Mangerett More, Harison Eads, Ida Eads and Maud Eads be made parties defendant to this bill of complaint, that they be required

to answer the same, but not upon oath that being expressly

waived, that a guardian ad litem be appointed for the said Har-

ison, Ida and Maud Eads, that commissioners be appointed to assign

your oratrix dower in her said husbands interest in ~~the~~ said

two tracts of land, and if the same can be done without injury

her dower interest in
to any other party, the interest of her said husband in said two

tracts of land, be laid off to her in one body. And that all other

further and general relief be granted your oratrix that the nature

of her cause may require, and she will ever pray &c.

Pennington Bros P.A.

Peffs Costs
to Nov. T. 1898

Clerk 5.10
Tax 1.50
Shiff 3.50
L & L 5.00
J. P. 3.00 Due Munsy
Wits 2.50
Total 20.60

Elizabeth Coe.

vs.  Bill in Chancery

Harrison Co. vs. et al

1897 1st Sept rules Spa
Executed & D. M.
2nd Sept. no D. M.
Conf'd & Cause set for
hearing

Costs to Nov Term 1898

Clerk 6.60
Shiff 3.50
L & L 5.00
J. P. 3.00 Pd by Munsy
Wits 2.50

No.

To the Hon. W. T. Miller, Judge of the Circuit Court for Lee County:

The separate answer of Harrison, Ida, and Maud Eads, infants under the age of twenty-one years, by L. T. Hyatt, their guardian ad litem, assigned to defend them in this suit, to a bill of complaint exhibited against them and others, in the said court, by Elizabeth Eads:

Respondents, reserving to themselves the benefit of all just exceptions to the said bill, for answer thereto, or to so much thereof as they are advised that it is material they should answer, by their said guardian ad litem, answer and say:

That they are infants of tender years, and by reason of their infancy, are incapable of understanding, or of taking care of their rights and interests. They, therefore, by their said guardian, commend themselves and their rights and interests to the protection of the Court, and pray that no decree may be pronounced which will tend to their prejudice.

And now having fully answered, the said respondents pray to be hence dismissed with their reasonable costs

in this behalf expended, and they will
ever pray, &c.

L. T. Hyatt, Guardian ad li-
tem for Harrison Eads, Ida
Eads and Maud Eads.

Virginia:

County of Lee, to wit:

This day personally appeared be-
fore me, A. B. Munsey, Clerk of the
Circuit Court for said County, L. T. Hy-
att, Guardian ad litem for Harrison,
Ida, and Maud Eads, whose answer
is above written, and made oath that
the statements contained in the said an-
swer, so far as made of his own
knowledge, are true; and so far as
made from knowledge or informa-
tion derived from others, he believes
to be true.

Given under my hand this
day of October, 1897.

A. B. Munsey Clerk

Elizabeth Eads

vs ³/₃ In lcy.
Harrison Eads et al

Answer of Harrison,
Ida, and Maud
Eads, by L. T. Hyatt,
their Guardian ad
litem.

Filed Oct 21st 1897
A B Munsey Clerk

G. A. L. Fee \$5.00

Elisabeth Edds. Plff-
against $\frac{1}{2}$ In Chancery -
Harrison Edds et al. Defts.

The separate answer of Amanda Bates to a bill filed against her and others in this Honorable court by Elisabeth Edds, for answer thereto says - that it is true that her late husband Huston Edds died some 15 years ago, seized and possessed of a tract of land containing about 150, lying and being in Lee County, but your respondent alleges that her said husband was also seized and possessed of another tract of land containing about 40 acres, and an undivided one half interest in another tract of land containing 100 acres, fully described in a chancery cause in this court entitled, Jesse R. Edds, vs. Amanda Edds et al, - your respondent alleges that she has never been assigned dower in any of the aforesaid tract and that she is entitled to have her whole dower assigned in the home tract of 150 acres - She further admits so true that the heirs at law of Huston Edds dec. are properly set out in said bill, your respondent denies that Henry Edds - purchased the 50 acres described in said bill, but that said tract was purchased jointly by your respondent, Henry Edds, and Harrison Edds - and your respondent alleges that she paid on the purchase price of said land, the sum of \$210, and that Henry and Harrison paid \$190, and the balance is yet due and unpaid, your respondent supposes that it is true that the plaintiff is entitled to dower in Henry Edds' interest, but your respondent alleges that she is entitled to her whole dower in the 150 acre tract as the other two tracts aforesaid out of which she has never been

assigned downer, has been sold and the children of
Houston Edds Dec, by their Guardian have received the
same, And now having answered so fully as she
is advised that it is material for her to answer
she asks the Court to protect her interest, and
if necessary this answer be treated as a cross bill
and her whole downer assigned her in
the 150 acres - tract And Jan respondent
pay for all other and general relief, And that
the cause be dismissed with her reasonable
costs expended - etc - M. G. Ely J. d.

Elizabeth Edds. Duff
vs { { { Museum of
 { { { Canada Bala -
Horison Edds chas Duff
Filed in open court
and by leave thereof
November 8th 1897
A B Munsey Clerk

To the Honorable W.T. Miller Judge of the Circuit Court of Lee county
Virginia

The separate answer of Amanda C. Bales to a bill exhibited against her
and others in this Honorable Court by Elizebeth Eads

Respondent saving the benefit of all such proper exceptions and
objections as may be taken or had to said bill for its many misstate-
ments of facts and errors of law for answer thereto or to so much there-
of as she is advised that it is necessary to answer answering says, that
it is true that her late husband Houston Eads departed this life some
fifteen or eighteen years ago, that it is further true that at the time
of his death he was seised and possessed of the 150 acre tract of
land mentioned in the bill, but this is not all the land owned by the
said Houston Eads at the time of his death. At the time of the said
Houston Eads' death he owned with his brother Jesse E. Eads a tract of
land situated in the neighborhood of Bales' Forge containing about 100
acres, he also owned a one fourth interest in another tract of land
containing about 60 acres as she is informed.

It is true that the said Houston Eads at his death left surviving
him your respondent, his widow, and five children to-wit Margaret, Henry
T., Ida B., Charles Harrison, and Maud Jane, to whom said lands descended

Your respondent will now show your Honor that shortly after the
death of her said husband, the said Houston Eads, Jesse E. Eads filed
his bill on the Chancery side of this Honorable Court against herself
and the five children and heirs at law of the said Houston Eads above
named the object of which was to sell the said 100 acre tract owned by
himself and the said Houston as aforesaid; in said suit said land was
sold for the sum of \$800.00 one half thereof after the payment of ^{costs of} said
suit and sale was paid over to the guardian of the said five heirs at
law of the said Houston Eads. This arrangement was made and said chil-
dren given the benefit of all of said money and your respondent none ~~of~~
~~the~~ under the distinct understanding and agreement that your respondent
was to be compensated for her dower interest in said 100 acre tract by
the assignment to her of a larger dower in said 150 acre tract. The
same disposition was made of the said Houston's interest in said 60

acre tract and his interest in that tract when sold netted as she is informed, the sum of \$100.00 which was also paid over to the guardian of said children.

Your respondent will now show your Honor that she has never been assigned dower in any of the lands owned by her deceased husband at the time of his death. She has never asked for the same to be assigned her and the heirs whose duty it is, as she is informed, to assign dower to her, have never seen proper to do so because as she supposes, they have never desired the same to be done on account of the fact that she has raised them, fed them, clothed and schooled them, but now when a stranger has come in seeking participation in said estate your respondent asks that full dower be assigned to her, that this assignment all be made out of the 150 acre home tract and that in said assignment that she be laid off not only one third in rental value of said home tract but that she be laid off an amount equal to one third ~~there~~ in rental value of all the lands owned by her deceased husband, the said Houston Eads, at the time of his death. And for the purpose of securing this relief, your respondent prays, if necessary, that this answer be treated as a cross ~~bi~~ bill.

Respondent says that it is not true that her son ~~the~~ the said Henry Eads purchased from one Elbert Bales a tract of land containing about 50 acres, but it is true that the said Henry T. Eads and his brother Charles H. Eads on or about the 8th day September 1896 did purchase jointly from the said Elbert Bales a tract of land containing by estimation 40 acres more or less all of which is more fully shown by the deed of the said Elbert Bales and wife to the said Henry and Charles H. Eads dated on the 8th day of September 1896 which is herewith filed as a part hereof marked exhibit "A"

Upon an inspection of said deed it will be seen that the consideration is \$450.00 paid and secured to be paid. Of this consideration the said Henry T. Eads in his life time paid the sum of \$155.00 leaving a balance due from him the sum of \$295.00. Your respondent paid ~~the~~ to the said ~~Henry Eads~~ Elbert Bales for the said Charles H. Eads the sum of \$195.00. This payment for the said Charles H. Eads was made in this way: \$100.00 of it was in a note which she held on the said Elbert Bales with ~~A.F. Bales~~ as security, \$50 of it was for the price of a horse of hers.

hers got by the said Elbert Bales, the remaining \$45.00 of the \$195.00 was paid out of the price of a sorrel mare which the said Henry Eads turned over to the said Elbert Bales at the price of \$75.00, \$30.00 of which said mare was the property of the said Henry T. Eads and \$45.00 was the property of your respondent.

Respondent has no objection whatever to the assignment of dower to the complainant in such lands as the said Henry Eads owned at the time of his death and this could readily have been done at her request at any time, without the cost and trouble of a Chancery suit. And now having fully answered respondent prays your Honor to fully protect her interest in said cause and secure by proper decrees her rights in said lands and she prays to be hence dismissed with her costs.

C. J. Duncan Adm. M. Y. Ely p.d.

The plaintiff objects to the filing of
this answer, because she has heretofore
to wit on Nov. 8th 1897 filed an answer
in this cause, and in this answer she
shows no reason why she desires to
file another.

Pennington Bros.
for Com. pld.

Answer to

ad. by Shur,

Leigabuck & Co.

To the Honorable W.T. Miller Judge of the Circuit

Court of Lee County Virginia:

The amended answer of L.T. Hyatt guardian ad litem for Charles H. Eads one of the defendants in the chancery cause now pending in this honorable court styled Elizabeth Eads against Harrison Eads and others.

Respondent by way of amendment to said answer heretofore filed by him will show your honor that ~~HENRY HANXIN HANX~~ his ward the said Charles Eads, who is sued by the name of Harrison Eads, is an infant, under the age of 21 years, and that the answer heretofore put in by him is merely formal, and that since said answer was filed he has learned that the tract of land mentioned and described in said bill of said complainant as a fifty acre tract was not purchased by the said H.T. Eads now deceased, but that it was purchased jointly by the said W.T. Eads and the said C.H. Eads and was jointly conveyed to them, and he files herewith the deed of the said Eads the vendor of said land to himself and his deceased brother marked "A." which he prays may be considered as a part of this answer. He has been further informed that the said Charles H. Eads his ward has fully paid ~~the~~ ^{his} part of the purchase price of said land but that there is still due from the said Henry T. the sum of \$70. but whether the same is a lien on said land he does not know

*L. T. Hyatt, Guardian
ad litem for Charles
Harrison Eads.*

*Sworn to before me by L. T. Hyatt this the 14th of
June 1898.
A. B. Munsey Clerk*

Elizabeth Eads.

vs $\frac{3}{3}$ Luc Chauncy-

Harrison Eads et als

Supplemental answer
of Guardian ad
litern.

Filed in open Court
and by leave thereof
on June 14th 1898
D B Munsey Clerk

Elizabeth Edds

^{vs}
Harrison Edds et al

To the Hon. W. P. Miller, Judge of
the Circuit Court for Lin County.

The defendant answers of Elizabeth Edds to a cross-bill filed by Amanda C. Bales in this cause, and for answer thereto, says said cross-bill is not sufficient in law to call upon her to answer the same:

But if 'mistaken in the course of her answer and further answer should be required of her answering, says:

That it is not true as alleged by said Amanda that said Huston Bales was the owner in his life time of a 40 acre tract of land, ~~and many~~ ^{other} ~~other~~ lands ~~that~~ than the 150 acre tract, and a one-half interest in a 100 acre tract. But if such should be the case, and said Huston did own said 40 acre tract and a half interest in the 100 acre tract, your respondent to said cross-bill says she is entitled to have therein because she is advised that if said Amanda

your respondent deays that said
Amanda, and said Harison Eldo paid on
the 50 acre tract any sum or sums of
money whatever, but on the contrary the
whole purchase price was paid by her
husband.

ever had any claim of dower in
either of said tracts of land, which
respondent in no wise admits,
such claim is now barred by the
statute of limitations, for it
has been more than ten years
since said 100 and 40 acre
tract was sold, and ^{the same} is now,
and for more than 10 years
with proceedings the insti-
tution of this suit has been in
^{open & notorious} the adverse possession of others,
under color of claim of right,
facts all known to the said
Amanda. *

Now having fully answer-
ed said cross bill as fully
as she is advised it is ma-
terial for her to answer, she prays
that said cross bill be dismissed,
& she will now pray &c

Elizabeth Eldo
by Counsel

Elizabeth Edds

vs } Answer to
 { Cross bill

Marion Eddes

Filed Jan 15th 1848
A B Munsey Clerk

Elizabeth Edds }
vs } Decree
Harrison Edds & al

This cause came on this day to be heard upon the papers formerly read therein and by consent of counsel both for complainant and defendant, it is adjudged, ordered and decreed that all matters in this cause be settled between said parties, by the said defendant paying to said complainant \$100⁰⁰ for her dower and \$15⁰⁰ on the costs of this suit, and that said complainant ~~re~~ agreed to accept said sum in lieu of her dower in all the lands of which her said husband was seized in his life time: It is therefore adjudged, ordered and decreed that said defendant pay to said complainant \$100⁰⁰ and \$15⁰⁰ on the costs of this suit, and that said complainant relinquish her dower rights in the land in this cause mentioned, in consideration of said sums of money. And this cause is continued.

Elizabeth Edds

Wm. Edds

Wm. Edds

Eccl. Cor. 6 p. 209

Enter this

Nov. 16/98

W. E.

Elizabeth Edds Complt

vs.

Harison Edds et al Defs

} In Chancery

The defendant Amanda Bales moved the Court for leave to file her amended ^{answer} ~~bill~~ in this cause, to which filing the Complt. objected and thereupon the Court the Court refused to allow her to file her said amended ^{answer} ~~bill~~.

This cause, then coming on to be heard upon the bill of the Com-
plainant, the ^{several} answer ~~filed~~ of
Amanda Bales in her own prop-
er person & filed in this cause
on Nov. 8th 1897; and the an-
swer of Harison, Ida, and
Maud Edds by L. J. Hyatt their
guardian ad litem, and gener-
al replication to each of said
answers, and the depositions of
witnesses, and was argued by
counsel; On consideration of
all which and for reasons
appearing to the Court, it is
adjudged ordered and decreed
that L. M. Carmichael, Daniel
Dean, W. H. Dean and Jeff. Brooks

who are hereby appointed Com-
missioners for the purpose (any
three of whom may act) will go
upon the lands in the bill and
proceedings mentioned, and first
out of the 150 acre home tract
of land owned by Houston Edds in
his life time, ^{lay off and assign to said Amanda} a dower, equal
to a one-third rental value of
the said 150 acre tract and the 40
acre tract and the one-half inter-
est of the 100 acre tract; and sec-
ond they will also lay off and
assign to the Complainant a dower
equal to a one third rental value
of the 50 acre tract of land which
Complainant's husband purchased
from one E. P. Bales, and also
a like dower in any part of
the 150 acre tract adjoining the dower
that may be assigned her in the said
50 acre tract, ~~and~~ out of the one-
fifth of the 150 acre tract, not
covered by the dower of that
^{which} may be assigned to said Amanda;
and they will report their action
to Court; and this cause is con-
tinued.

Elizabeth Edds

of Dresden

Harrison Edds & al

Enter this
June 1898.

The Depositions of E. P. Bales and
Samuel Dean
taken before me Geo. W. Sillman a
Justice of the Peace for the County of Lee
and State of Virginia, pursuant to
notice hereto annexed at Rose Hill
depot in Lee County between the hours
of 8 - A.M. and 5 - P.M. on the
6th day of January, 1898 to be read as
evidence in behalf of the plaintiff
in a certain suit in equity now
pending in the Circuit Court for
Lee County, wherein Elizabeth
Edds is plaintiff and Harrison Edds
et al are defendants

Present E. H. Huntington Counsel for Pltff.

" Ida Harrison Edds two of Defs

E. P. Bales a witness of
lawful age, being duly sworn, de-
poses as follows.

Ques 1 Give your name, age, residence
and occupation.

Ans E P Bales Residence near Rose Hill
Lee County Va age 32 years I am a
farmer

Ques 2 Were you acquainted with Henry
Edds in his life time, if so, state
whether you ever knew of him buying
any lands, from whom & where and
all about it?

Ans. I have said Edds nearly all his life
I think in August 1896 I my self sold to

said Shoney Eddy about 40 acres land in Lee
county on the head waters of Hawk mill
creek and adjoining the lands of Thomas Eddy
and George Macaaron and also being a part
of that was known as the Charley Mac land
and for which land the said Shoney Eddy
was to pay me \$99.50 of one hundred and
fifty dollars. Of the purchase price on
this land said Eddy before his death
paid me three hundred and fifty
dollars. I made this trade with no one
else. Except said Shoney Eddy to this
land I have made a deed and confirmed
the same to said Shoney Eddy. In the deed
that I made to said land for the same me
I said not retain a vendue lien for the
balance due me, that is, one hundred
dollars on September the 8th 1896. I took
said Shoney Eddy individual state for
on the 1 day of Jan 1898 this note I have
hereafter sold to R. B. Bales. of the three
hundred and fifty dollars paid me on said
land I got 2 head of horses from said
Shoney Eddy which were rated at one hundred
and twenty five dollars and a credit of \$9.70
on a note that I and Janie Dean also
are hundred and fifteen dollars and thirty
cents cash which sum his guardian J. B.
Bales paid ~~me~~ ^{on} Shoney Eddy which the
said Shoney Eddy paid to me at the
same time he received it of J. B. Bales
also said Shoney Eddy paid me a one
hundred dollar note which I gave
to Amanda Bales for balance money

When I sold said land to said Shoney
Eddy I understood that he expected 3 or 4
months of being of age and the three
hundred and fifty dollars paid me all
of it except one hundred and fifteen
dollars and thirty cents was paid me before
he became of age I understand at the time
I made the trade with him he had been
trading at his own store after he had
become of age I think same time in Feb
1897 I delivered to said Shoney Eddy the
Deed of said land. The said Shoney
Eddy said same time in June 1897 the land
that I sold to said Shoney Eddy adjoined the
old Hustan Eddy tract of land

X Ex by Defts

whose names was the 2 horses you got
on the purchase of said land

ans I want please all altho I want Shoney
Eddy deliver the horses to me soon
time after the trade was made Mrs Bales

called to me and said she was sorry
her horse was gone I replied is not
any trade I made with him all right
with you and she answered it was
from whom said you got the hundred
dollars note was Bales or Shoney Eddy

ans I got it from Shoney Eddy
ans said ^{you told} not Mrs Bales ~~off~~ you to let the hundred
dollar note go as a payment and the land you
sold Shoney Eddy

ans I think I said some several times before

Ques

Ans

Witness
Examined
1 day 50¢

we traded but I don't remember
what his answer was in making
the trade I heard no contracts between
Shenney Eddy and his mother if they had
any contracts I know nothing about it
what interest in said 40 acres of land said
Sharrison Eddy have at the time you made your
deed to the same according to what Shenney
Eddy said about it

he told me that he had sold Sharrison
Eddy a half interest in it ~~Sharrison~~ he said
that Sharrison would sign the note with
me and had a not put to it to sign but
he never signed it and has not since
so up to this day ~~note~~ was there any
thing said in my presence that Sharrison
should have a half interest in the land
for what his mother had paid on
it if she paid any thing on it I don't know
it

and further this Dependant sayeth not
Elbert Bales

Daniel Sum another witness of
lawful age after being sworn
deposes as follows:

Ques. 1

Give your name, age and
residence & occupation.

Ans.

Daniel Sum age 40 years I live near
Living the occupation Merchant and Farmer

Ques. 2

Did you know Henry Eddy in his
life time

Ans.

I will

Ques.

Did you draw any notes for Henry Eddy to sign before he died; if so, for how much and at whose suggestion. State all you remember about it.

ans.

From & to 9 days before Shemmy Eddy died his Mother Miss Bales called me in the house and told me Shemmy wanted me to do some writing for him I went to Shemmy's Bed and he turned his head and told me he wanted a couple of states charged and payable to his Mother and the other payable to George Mancum I claim the states as requested and as I remember about them the one to his Mother was for Three hundred and Thirteen Dollars and the one to Mancum for Two hundred Dollars Both of these states Shemmy Eddy made his Mark for his signature I don't know what these states was given I never knew of any business transactions between the Parties and I live within one mile and half of where Shemmy Eddy lived as well as his Mother.

W. H. Claine
1 day 504

and further this Deparment Sayeth not
Daniel Brown

Virginia, Lee County, to wit:-

I, Geo. H. Sillman a Justice
of the peace in and for the
County of Lee & State of Virgin-
ia do hereby certify that
the foregoing depositions of
E. P. Bales and Daniel Sean
were duly taken, sworn to and
subscribed before me ~~at~~ at
the place and time and for
the purposes in the caption
mentioned, pursuant to the
aforesaid notice. Given under
my hand, this the 6th day of
January, 1898.

G. H. Sillman J.P.

Bill of costs:

E. P. Bales witness 1 day	50 ^x
Daniel Sean "	50
D. B. Bales "	50
R. C. Bales "	50
S. G. Bales "	50
	\$ 2.50
J. P. Sillman costs 4 hours	3.00
	\$ 5.50

Elizabeth Eddles

Ex. of
Witnesses

Harrison Eddles

Received by mail in good
Condition & filed Jan'y the
19th 1898.

A. B. Munsey Clerk

J. P. 300 Due. A. B. Munsey
Pavto 250
550

The foregoing depositions are accepted
to be Harrison Eddles because no notice
to take them was given to L. J. Hyatt
his guardian ad litem for him.

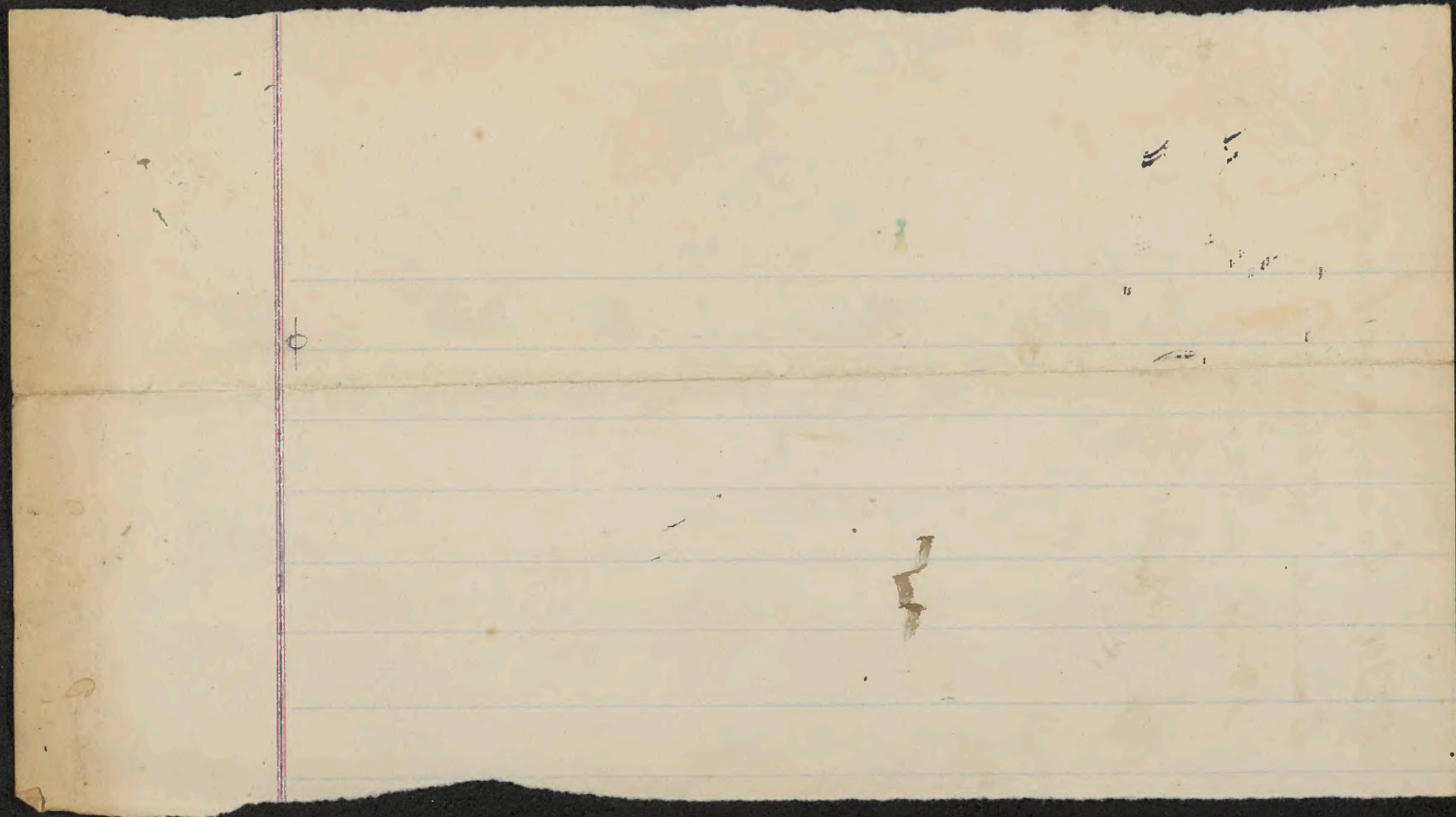
L. M. Carmichael

Daniel Dean

W. H. Dean

Juff Brooks

Dean



To Amanda C. Bales, Margaret Moore, Harison Edds, Ida Edds & Maud Edds

You are hereby notified that on the 6th day of Jan., 1898, at the depot at Rose Hill Railroad Station of the L. & N. R. R. in this County between the hours of 8 A. M. and 5 P. M. of that day, I shall proceed to take the depositions of Elbert Bales and others, to be read as evidence in my behalf, in a certain suit in equity now pending in the circuit court for Lee County, wherein I am plaintiff and you are defendants; and if from any cause the taking of the said depositions be not commenced, or if commenced be not completed on that day, the taking thereof will be adjourned from time to time and from day to day at the same place, and between the same hours and until the same are completed/

Yours Very truly,

Elizabeth Edds by Counsel.

Elizabeth E. L. L.

no } Notice to Take
Depositions

Amanda C. Balis et al

et al et al in and the

January, 1898

N. J. January 1898

Hereby D. M. M.

S. L.

The Commonwealth of Virginia,

To the Sheriff of the County of Lee--Greeting:

WE COMMAND YOU, That you summon *Daniel Deane, George Bales*
Elbert Bales, D. B. Bales & Drek Bales

G. W. Dillman at *Rose Hill Lees Va*
to appear before the Judge of our Circuit Court of the County of Lee at the court house thereof on the *6th*
day of *January* 189 *8*, to testify and the truth to say in behalf of the *Plff*

in a certain matter of controversy in our said Court, before the said Judge depending and undetermined between

Elizabeth Eads

Plaintiff, and

Harrison Eads et al

Defendant. *8*

And have then there this writ. Witness, A. B. MUNSEY, Clerk of our said Court, at the court-house, the *20th*
day of *December* 189 *7*, and in the 12 *2nd* year of the Commonwealth.

A copy--Teste:

A. B. Munsey Clerk.

XXXXXXXXXXXXXXXXXXXX

Elizabeth Cado

Vs.

SUBPENA
FOR
WITNESS.

Harrison Cado et al

XXXXXXXXXXXXXXXXXXXX

Circuit Court, the 6th day
of January 1898.

Exhibits in file
this morning the
3 5 & 10 of morning
of 5 Jan. 1898
operation of 26

25.055

201

25.055

25.52

20.06

9.40

52.0

125.51

9.40

115.22

25.30

The Commonwealth of Virginia,

To the Sheriff of the County of Lee---Greeting:

We Command you, That you summon *Amanda Bales, Margaret Moore, Eda Edds, Harrison Edds. and Maude Edds*

to appear at the Clerk's Office of the Circuit Court of the County of Lee, at the rules to be held for the said Court on the *1st* Monday in *September*, 189*7*, to answer a bill in Chancery, exhibited against *them* in our said court by *Lizzie Edds*

And have then there this writ. Witness, A. B. MUNSEY, Clerk of our said Court, at the court-house, the *20th* day of *July*, 189*7*, and in the *2nd* year of the Commonwealth.

A B Munsey Clerk.

Lizzie Eddo

SUPRENA.

vs.

IN CHANCERY.

Annanda to Bales itals

P Bros p. q.

To 1st Sept Rules.

CIRCUIT COURT.

Exhibit August, The
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Bales to Margaret, here
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Edo, and Annanda Edo
N.S. Jennings D.S.
for Ann P. Hester
S L C